

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Pankaj Merchia
617 BOYLSTON ST
BROOKLINE, MA 02445
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Plaintiff,

v.

Virginia Board OF Medicine,
Virginia Department
of Health Professions,
William L. Harp, M.D.,
Jennifer Deschenes, J.D.,
Kevin O'Connor, M.D.,
Syed Ali, M.D.,
Jasmine Gore,
Alvin Edwards, Ph.D.,
Jane Hickey, J.D.,
Isaac Koziol, M.D.,
Erin Barrett, J.D.,
Tamika Hines,
James Schliessmann, J.D.,
Shevaun Roukous, J.D.,
Cynthia Leveille, J.D.,
Siobhan Dunnavant, M.D.,
Wayne Reynolds, M.D.,
Gerald A. Milsky, J.D.

9960 Mayland Drive, Suite 300
Henrico, Virginia 23233-1463

Defendants.

Case No. _____

U.S. DISTRICT COURT
DISTRICT OF MASS.

2018 MAY 30 AM 10: 57

FILED
IN CLERKS OFFICE

**COMPLAINT FOR HARASSMENT, DISCRIMINATION, DEFAMATION, LIBEL,
BUSINESS INTERFERENCE, UNDUE ENRICHMENT, EMOTIONAL DISTRESS,
GROSSLY NEGLIGENT CONDUCT, AND INJUNCTIVE RELIEF**

UNDER SEAL

Jurisdiction

1. This court has jurisdiction since the parties of this case are from different states.

Venue

2. This court is an appropriate venue since the Plaintiff resides in Massachusetts, the Plaintiff resided in Massachusetts at the time of the underlying alleged acts that lead to this claim, and the Defendants continue to harm Plaintiff in Massachusetts.

Statement of Claim

3. Defendants intentionally harassed, discriminated against, defamed, committed libel against, interfered with the business of Plaintiff, unduly enriched themselves at the expense of Plaintiff, caused emotional distress to Plaintiff, and conducted themselves in a grossly negligent manner in investigating, prosecuting, judging, and otherwise pursuing charges against the Plaintiff.

Relief

4. Plaintiff hereby asks this honorable court to Order the Defendants to:
 - a. Compensate Plaintiff for his losses resulting from Defendant's unlawful actions.
 - b. Compensate Plaintiff for his expenses resulting from Defendant's unlawful actions.
 - c. Provide Plaintiff punitive damages against Defendants.

Certification and Closing

5. Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.
6. I agree to provide the Clerk's Office with any changes to my address where case related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Humbly and Respectfully,

P. Merchia

Pankaj Merchia
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Brookline, MA 02445
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email: pmerchia@gmail.com

This complaint lot + @
Clerk's office after no response
and speaking to security officer / CSO
at front desk. An african american
gentleman with a monstace.

P. Merchia
Tuesdy. 5/29/18

5:05 pm
Please call for credit card #
or # is 4154 1787 8327 7197 exp 04/18